



PROTECTING THE PRIVACY AND SECURITY OF RECORDS

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Questions for Today's Session



As a leader in my (school, section, district)...

- Which records am I (or my staff) responsible for?
- What kind of risk are my records facing?
- How can I protect these records?
 - What laws protect the privacy of my records or require transparency?
- Who needs to access my records and why?
 - How can we give people the *right* access?
- What can I do as a leader to let them do that safely? What processes, resources or training should I ensure we have?

Security and Privacy



- The goal is to adequately protect records
- How much security is enough? *It depends*
- The level of Security should match the sensitivity

Needs

- What is needed and what level of access is needed?



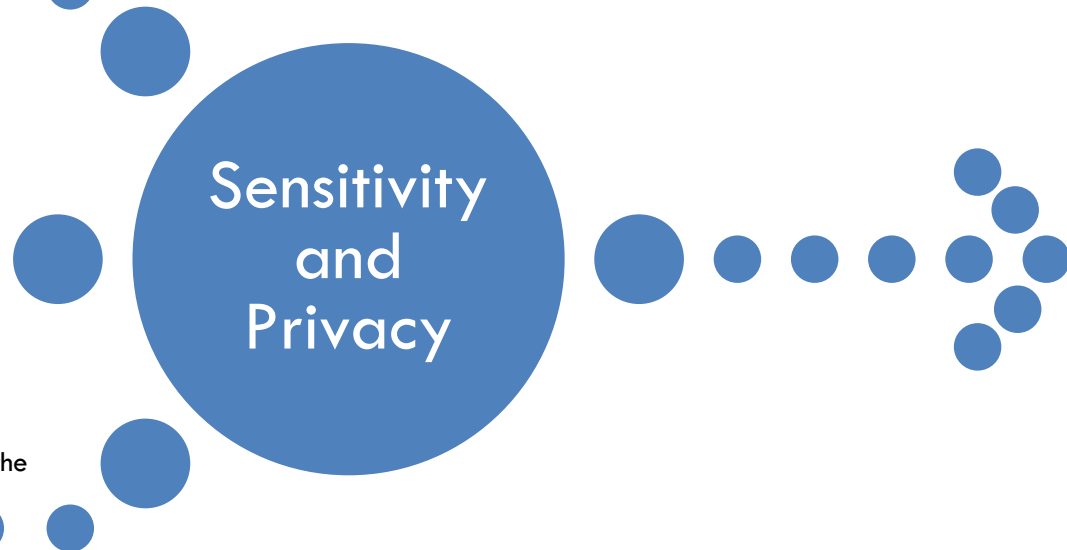
Regulations and Laws

- State, federal and local laws dictate the sensitive of records



Stakeholder Concerns

- What level of confidentiality do the owners of the records demand?





Which records am I (or my staff) responsible for?

GETTING TO KNOW YOUR RECORDS

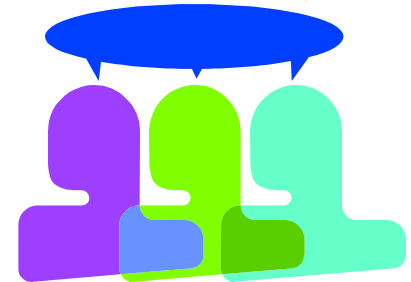
What scope are we talking about here?



Examples of recent inquiries to ADE:

- Donation of 100 year old student records to historic society.
- Disposal of student records in trash
- Articles containing information about student retention for Move On When Ready
- Teacher inquiry about snooping

Not All Records Are Created Equal- Group Exercise



Restricted

Sensitive

Public

Getting to know your Records



Impact definitions (National Institute of Standards and Technology FIPS-199)

- **LOW:** The loss of confidentiality, integrity, or availability could be expected to have a limited adverse effect on organizational operations, organizational assets, or individuals.
- **MODERATE:** The loss of confidentiality, integrity, or availability could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals.
- **HIGH:** The loss of confidentiality, integrity, or availability could be expected to have a severe or catastrophic adverse effect on organizational operations, organizational assets, or individuals.



What kind of risk are my records facing?

REALLY, YOU ARE AT RISK

Really, you are a target



Hack Forums - Request: Hack Powerschool

www.hackforums.net > ... > Requests for Hacking ▾

Jan 10, 2011 - 6 posts - 3 authors

I was just wondering if anyone could either hack powerschool for me or, preferably, ...
pm me if you want direct link to

Fayette schools alert parents of Infinite Campus scam

Sunday, April 28, 2013 - 6:20pm
Submitted by Ben Nelms

Board of Education Government Fayette County

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“Some districts have reported that staff or parents have received emails from people purporting to work for Infinite Campus, requesting usernames, passwords and email accounts to confirm ownership of their Infinite Campus account.”

Catholic schools close Friday following data breach

By KOMO Staff | Published: Mar 13, 2014 at 10:06 PM PDT

“The notice says hackers have been able to steal personal information, file fake tax returns and redirect the money to themselves.”



What laws protect the privacy of my records or require transparency?

HOW CAN I PROTECT MY RECORDS AND MY STAFF?

It's about people



Negligent staff are the top cause of data breaches in the United States

- 2011 Cost of a Data Breach Study: United States, Symantec Corp. and Ponemon Institute.

Data Breach Exposes 6,000 High School Students' Personal Data

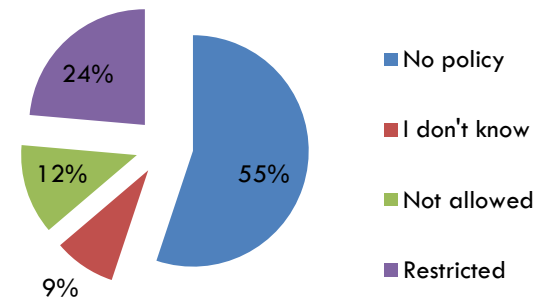
The students' names, birthdates, genders, final grades, learning skills and work habit assessment scores were mistakenly made available online.

By Jeff Goldman | Posted March 21, 2014

Spear Phishing Attacks are Often the Root Cause of Security Breaches

More than one third (34%) of respondents who reported experiencing a spear phishing attack in the past year believe that such an attack resulted in the compromise of user login credentials (e.g., usernames passwords) or unauthorized access to corporate IT systems.

Policies on working in public places



Who can see Educational Records? (The Floor)



All Student PII Data

Parents, Child

-School-
Teacher, Staff,
Coaches

**-LEA-
Authorized Staff**

School where student
seeks to enroll

Financial Aide

Accrediting
Organization,
subpoena, health or
safety

Directory Information

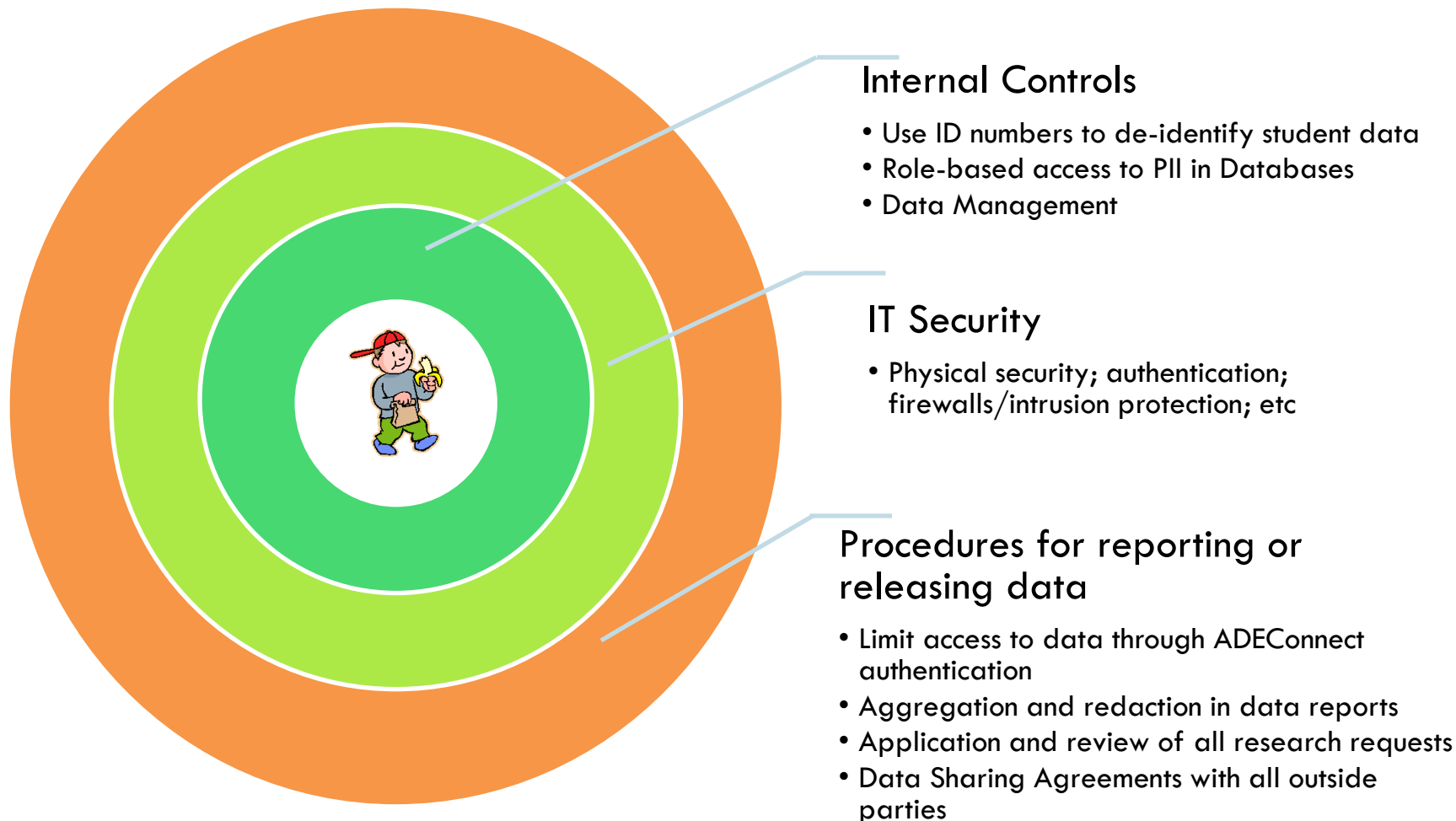
Selected, Relevant PII Data

Limited, Controlled, De-Identified Data

Org. conducting studies for/on
behalf of agency; must be for:
predictive tests, student aid
programs, or to improve
instruction

Audit or Evaluation of
Federally or State funded
program

Example: ADE's Layers of Protection for Student Data





Who needs to access my records and why?

How can we give people the *right* access?

RISK, ACCESS, AND TRANSPARENCY

Who's Asking?



- Who needs data, records or information?
- Roles
- How do you know who they are

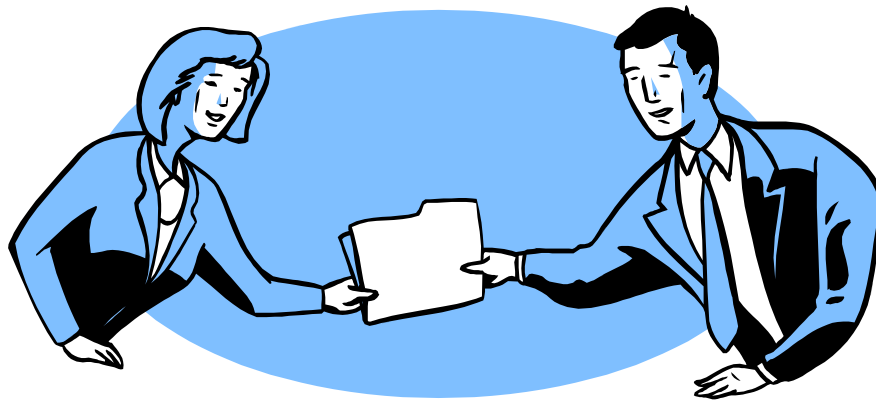
	Student	Staff	Parents
Roles	Student	Teacher, Finance, Administrator	Parent, Volunteer
Systems they access	SIS	SIS, ERP, HR, Finance, Gradebook	SIS, Website
Identity Verification	In-person, documentation	In-person, documentation	
Re-verification	Annually	None	

Where is all of this stored, how is it managed?

Sharing Records and Data



- Protect records and data that is shared from inappropriate use



Example: How ADE Processes Requests



Public
Records
Request

Public Records
Request
Tracking

Legal

Aggregated
Data
Request

On-line data
request form

Data
Governance
tracking

Peer reviewed
prior to
release

PII Data
Request

Application
Packet

Data Request
Review Board

Data Sharing
Agreement



What can I do as a leader to let them do that safely? What processes, resources or training should I ensure we have?

MAKING IT HAPPEN

Protecting Privacy, Security, Confidentiality of Records



Leadership's Role

Identify who is
Responsible

Establish
Policies

Support
Organizational
Capacity

Who is Responsible?



- Establish roles for data stewardship
- Do you want to designate an Information Security Officer? Privacy Officer?
- Who develops information security or privacy related policies?
- Who enforces policies?

Group Discussion: Questions to Consider



- Have you established policies to guide decisions about whether to share data with researchers, with third-party contractors, with vendors?
- When data are shared, do you have sharing agreements to ensure confidentiality? How do you track them? What if someone violates the agreement?
- When data are reported publicly in aggregate form, such as at board meetings, what methods are used to protect personally identifiable information? Do staff peer-review before releasing information?

What would you do if...



- PII was mistakenly released?
- a website used by your teachers was hacked?
- your own systems were hacked?

Thank you



If you have questions about data privacy, contact ADE's Data Governance Team.

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Terms



- **Privacy:** individual autonomy and personal control over who has access to a person's own information
- **Security:** physical protection of records or data
- **Confidentiality:** obligations of those who have access to another individual's personally identifiable information
 - **Personally identifiable information (PII):** information that can be used to distinguish or trace an individual's identity